

EXHIBIT E  
ROBIN TERRAZAS DEPOSITION

Robin Terrazas

Albert Sidney Johnston v. City of San Antonio

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

ALBERT SIDNEY JOHNSTON )  
CHAPTER NO. 2060, UNITED )  
DAUGHTERS OF THE )  
CONFEDERACY, ROBIN TERRAZAS, )  
PRESIDENT, JEAN CAROL LANE, ) 5:17-CV-1072-DAE  
FIRST VICE-PRESIDENT, )  
 )  
Plaintiffs, )  
 )  
vs. )  
 )  
THE CITY OF SAN ANTONIO, )  
 )  
Defendant. )

\*\*\*\*\*

ORAL DEPOSITION OF

ROBIN TERRAZAS

AUGUST 29, 2018

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THE ORAL DEPOSITION of ROBIN TERRAZAS,  
produced as a witness at the instance of the  
Defendant, and duly sworn, was taken in the above  
styled and numbered cause on Wednesday the 29th day  
of August, 2018 from 1:23 p.m. to 4:03 p.m., before  
PAMELA SUE PETERSON, Certified Shorthand Reporter in  
and for the State of Texas, reported by stenographic  
and computer-aided transcription, at the Law Office  
of Thomas J. Crane, 110 Broadway, Suite 420,  
San Antonio, Texas 78205, pursuant to the Federal

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1 have to ask you not to answer.  
 2 I mean, now you're getting into  
 3 attorney-client privilege. You're asking her why her  
 4 attorney advised her to become a party to the  
 5 lawsuit.  
 6 Q. BY MR. FITZPATRICK: Let me just ask this.  
 7 Are you making any separate claims on your  
 8 individual -- in your individual capacity in this  
 9 lawsuit?  
 10 A. I guess not, no. I mean, I'm here as a  
 11 representative of the chapter. I'm not trying to  
 12 separate myself.  
 13 Q. Okay. Well, actually, that saves a lot of  
 14 time here.  
 15 So, then, let me ask you some questions  
 16 about your -- your allegations here.  
 17 (Defendant's Exhibit T-1 was marked.)  
 18 MR. FITZPATRICK: I have marked as  
 19 deposition Exhibit No. T-1, the copy of your third  
 20 amended complaint.  
 21 Q. BY MR. FITZPATRICK: On Page 3, it's your  
 22 allegation here that in March -- on March 27, 1899,  
 23 the City Council granted to the Bernard (sic) Bee  
 24 chapter the right to use the land in the center of  
 25 Travis Park; correct?

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1 A. Uh-huh.  
 2 Q. And I'm reading from Paragraph 5.  
 3 And would that be an interest that was --  
 4 that is reflected in what I'm marking as deposition  
 5 Exhibit No. 2?  
 6 (Defendant's Exhibit T-2 was marked.)  
 7 MR. FITZPATRICK: I really screwed up.  
 8 Here you go, Tom.  
 9 THE WITNESS: Okay. So the handwritten  
 10 part you can't see at all, but -- so your question,  
 11 again, was does this document reflect the claim that  
 12 Barnard Bee chapter had the right to use the land?  
 13 Q. BY MR. FITZPATRICK: No, let me ask the  
 14 question again.  
 15 Is this the -- is Exhibit T-2 a  
 16 representation of what you have alleged to be an  
 17 ordinance dated March 27, 1899, whereby the City of  
 18 San Antonio granted to the Bernard Bee chapter the  
 19 right to use the land in the center of Travis Park?  
 20 A. Yes.  
 21 Q. Okay. Is there any other document on which  
 22 that claim is based?  
 23 A. No.  
 24 Q. Okay. So you also allege that the City  
 25 gave in the same -- I'm sorry -- I'm in the same

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1 paragraph here -- that the City gave use of the land  
 2 underneath the monument to the Bernard E. Bee chapter  
 3 in perpetuity. Are you making that allegation?  
 4 A. Yes.  
 5 Q. And by "in perpetuity," what do you mean by  
 6 that?  
 7 A. That it was a permanent -- it was given use  
 8 permanently.  
 9 Q. Okay. And what is your understanding of  
 10 whether or not the monument was intended to remain  
 11 there permanently?  
 12 A. I know it was -- it was stated in 1999 when  
 13 they rededicated the monument -- the Albert Sidney  
 14 Johnson (sic) chapter rededicated the monument in  
 15 1999. And the president at that time was Theresa  
 16 Gold, and she -- she reported it having been in  
 17 perpetu- -- whatever -- she used that word, too; that  
 18 it had been granted to -- the chapter had been  
 19 granted use of that land.  
 20 Q. Okay. I mean, is it your understanding  
 21 that the chapter intended the monument to remain  
 22 there forever?  
 23 A. Yes. Yes.  
 24 Q. Okay. So if you look at Exhibit T-2, is  
 25 there -- can you find me any indication in there of

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1 the type of permanence that you've just testified to?  
 2 A. I don't see anything that says until any  
 3 certain condition exists that it would be removed.  
 4 It's a large statue. I can't imagine that the City  
 5 would have said, "Okay, here, you can put this statue  
 6 here and we expect it to be removed at some point,"  
 7 considering the size of it.  
 8 Q. Okay. The language in Exhibit T-2 does not  
 9 use the term "perpetual," does it?  
 10 A. No, it does not.  
 11 Q. Okay. It doesn't say "forever"?  
 12 A. It doesn't say any limitations.  
 13 Q. Okay. Well, and what exactly were the  
 14 Daughters of the Confederacy asking for, according to  
 15 Exhibit T-2?  
 16 A. Permission to erect a monument in Travis  
 17 Park.  
 18 Q. Anything else?  
 19 A. I don't see anything else, no.  
 20 Q. Okay. Where is Bernard E. Bee mentioned  
 21 here?  
 22 A. It is not mentioned here, but the petition  
 23 was written by Barnard E. Bee.  
 24 Q. Do you have a copy of the petition?  
 25 A. I don't remember.

6 (Pages 18 to 21)

<p style="text-align: right;">Page 22</p> <p>1 Q. Have you ever seen --</p> <p>2 THE WITNESS: Can I ask you that question.</p> <p>3 MR. CRANE: Well, no, you -- I'm afraid you</p> <p>4 have to answer the question.</p> <p>5 THE WITNESS: I -- I don't remember.</p> <p>6 Q. BY MR. FITZPATRICK: Okay.</p> <p>7 A. It -- it --</p> <p>8 MR. CRANE: I can stipulate --</p> <p>9 THE WITNESS: It seems that we've seen it,</p> <p>10 but I don't remember.</p> <p>11 Q. BY MR. FITZPATRICK: You know, when "I</p> <p>12 don't remember" is the truthful answer, it's the</p> <p>13 right answer.</p> <p>14 MR. CRANE: But I'm happy to stipulate if</p> <p>15 there is such a kind of petition, it has not revealed</p> <p>16 itself.</p> <p>17 MR. FITZPATRICK: Okay.</p> <p>18 Q. BY MR. FITZPATRICK: Is there any other</p> <p>19 document that you're aware of that reflects that</p> <p>20 Bernard E. Bee rather than the United Daughters of</p> <p>21 the Confederacy were granted permission by the City</p> <p>22 Council back in 1899?</p> <p>23 A. Well, it was the UDC that was granted</p> <p>24 permission, but it was through the Barnard Bee</p> <p>25 chapter.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Uh-huh.</p> <p>2 A. -- but not from when this occurred.</p> <p>3 Q. Okay. You would agree with -- well, would</p> <p>4 you agree with me that the Daughters of the</p> <p>5 Confederacy is a distinct organization than a chapter</p> <p>6 of the Daughters of the Confederacy?</p> <p>7 A. I'm sorry? Could you repeat that.</p> <p>8 Q. Okay. So there's something called "The</p> <p>9 United Daughters of the Confederacy"?</p> <p>10 A. Yes.</p> <p>11 Q. And there's something called "The Albert</p> <p>12 Sidney Johnson (sic), Chapter 2060" --</p> <p>13 A. Uh-huh.</p> <p>14 Q. -- "of the United Daughters of the</p> <p>15 Confederacy"?</p> <p>16 A. Uh-huh.</p> <p>17 Q. Would you agree with me that they are</p> <p>18 separate organizations?</p> <p>19 A. It is the same organization, separate</p> <p>20 chapters.</p> <p>21 Q. Okay. Well, would you agree with me that</p> <p>22 when a chapter disbands, the UDC rules require the</p> <p>23 chapter's property to be surrendered to the UDC --</p> <p>24 well, I'm sorry, the State division of the UDC?</p> <p>25 A. That's dependent on the chapter. It's left</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Okay. And I'm -- do you have any document</p> <p>2 that reflects that relationship that you just</p> <p>3 described?</p> <p>4 A. What relationship?</p> <p>5 Q. That this permission was granted to the</p> <p>6 UDC, but through the Bernard E. Bee chapter?</p> <p>7 A. Well, it -- you see that the petition was</p> <p>8 written by Barnard E. Bee. And then the ordinance</p> <p>9 states "UDC."</p> <p>10 Q. Okay. Have you looked through the Bernard</p> <p>11 E. Bee meeting minutes to determine whether there's</p> <p>12 any document or other indication that would suggest</p> <p>13 that Barnard E. Bee was the petitioner here?</p> <p>14 A. We have not been able to locate the</p> <p>15 Barnard E. Bee minutes from --</p> <p>16 Q. Those weren't turned over to you -- I'm</p> <p>17 sorry, I didn't mean to talk over you.</p> <p>18 A. We've not been able to locate those minutes</p> <p>19 from that time period.</p> <p>20 Q. Okay. So those weren't turned over to your</p> <p>21 chapter when Barnard E. Bee disbanded?</p> <p>22 A. Barnard Bee did not disband until in the</p> <p>23 1970s. And I don't know what happened to the minutes</p> <p>24 at the time. We've been able to find some of their</p> <p>25 minutes from different time periods --</p>	<p style="text-align: right;">Page 25</p> <p>1 up to the chapter to decide what they do with those</p> <p>2 items.</p> <p>3 When Barnard Bee disbanded, the president</p> <p>4 of the chapter came to visit the Albert Sidney</p> <p>5 Johnson chapter, and she specifically handed the copy</p> <p>6 of the ordinance to the president and said that "We</p> <p>7 want you to have this in event that there's ever any</p> <p>8 need for it."</p> <p>9 Q. Okay.</p> <p>10 A. So at that time we take it that we were</p> <p>11 given the responsibility of protecting the monument</p> <p>12 in Travis Park.</p> <p>13 MR. CRANE: But let the record show that</p> <p>14 the witness is pointing to the 1899 ordinance.</p> <p>15 Q. BY MR. FITZPATRICK: Okay. So what you --</p> <p>16 what you've said is that it's your testimony that</p> <p>17 when the Barnard E. Bee chapter disbanded, it gave to</p> <p>18 Albert Sidney Johnston --</p> <p>19 A. Yes.</p> <p>20 Q. -- its property -- well, specifically the</p> <p>21 monument?</p> <p>22 A. Responsibility for the monument, yes.</p> <p>23 Q. Okay. So -- well, responsibility for the</p> <p>24 monument or ownership of the monument?</p> <p>25 A. There was no ownership papers, so I don't</p>

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1 see how that would have transferred.  
 2 Q. Are you claiming that the monument is the  
 3 property of the Albert Sidney Johnston chapter?  
 4 A. Yes.  
 5 Q. Okay. So who owned it before the Albert  
 6 Sidney Johnston chapter did?  
 7 A. Barnard Bee or you could say UDC.  
 8 Q. Well, which would you say?  
 9 A. Barnard Bee is the one that raised the  
 10 funds. They spent three years on the project for  
 11 development, for placing it, raising the money not  
 12 just for the development of this statue, but also to  
 13 have it placed; so I would say Barnard Bee.  
 14 Q. Well, the UDC didn't give you the statue;  
 15 true?  
 16 A. They did not; but, again, the UDC is an  
 17 organization with chapters within.  
 18 Q. Uh-huh.  
 19 A. So this was an effort of the Barnard Bee  
 20 chapter, so ...  
 21 Q. And what I'm getting at is each chapter has  
 22 its own charter; correct?  
 23 A. Yes.  
 24 Q. Has its own membership; correct?  
 25 A. Yes.

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1 Q. Pays its own dues?  
 2 A. It does; but some of those dues go to the  
 3 national --  
 4 Q. That's --  
 5 A. -- so it's all one organization still.  
 6 Q. And that's because the chapter pays the  
 7 dues to the State division; correct?  
 8 A. Well, the individuals are paying; but it  
 9 goes through the chapter and then to division and  
 10 general.  
 11 Q. Okay. And each chapter has separate  
 12 property ownership rights; correct?  
 13 A. Yes.  
 14 Q. Okay. And the UDC itself has ownership  
 15 rights of its own property; true?  
 16 A. Yes.  
 17 Q. And among the UDC rules are that if a  
 18 chapter disbands --  
 19 A. Uh-huh.  
 20 Q. -- that it surrenders its minutes and it  
 21 surrenders its property to the State division; true?  
 22 A. Unless otherwise decided on, on the  
 23 chapter.  
 24 Q. Okay. But --  
 25 A. There is that.

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1 Q. -- unless there's an exception, what I just  
 2 said was true?  
 3 A. It really is up to the chapter what they  
 4 give and where it goes.  
 5 Q. So the chapter can dispose of its own  
 6 property however it wishes?  
 7 A. That's my understanding.  
 8 Q. Without regard to the UDC's rules for  
 9 disbanded chapters?  
 10 A. They -- I know that they request that the  
 11 minutes go there, but there's also, as I recall, a  
 12 statement that says that "unless otherwise determined  
 13 by the chapter"; that's probably not the exact words,  
 14 but I think that's the meaning.  
 15 So I guess you could say that there's a  
 16 suggested standard, but you're not held to follow any  
 17 straight, hard line is my understanding. So you --  
 18 you have the suggested standard, but you also have  
 19 the option of what to do with that property.  
 20 I know that Barnard Bee did give Albert  
 21 Sidney Johnston the cemetery plots that they owned.  
 22 Those deeds were given to the Albert Sidney Johnston  
 23 chapter.  
 24 Q. And were those owned by Bernard E. Bee as  
 25 well?

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1 A. Yes.  
 2 Q. Okay. I'm going to ask you more about  
 3 those later on. But let me continue on with my  
 4 questions about your complaint.  
 5 So also continuing on Page 3, in Paragraph  
 6 No. 6, you indicate the purposes for which the ASJ  
 7 chapter was formed back in 1932.  
 8 Do you see where I'm reading?  
 9 A. Uh-huh.  
 10 Q. And are those -- it looks like four  
 11 purposes -- are those like the stated purposes of the  
 12 existence of the chapter?  
 13 A. I'm sorry, what number are you looking at?  
 14 Q. I'm in Paragraph No. 6. And I'll just read  
 15 it. "The purposes of the chapter being formed were  
 16 to honor the memory of Confederate veterans"; right?  
 17 A. Uh-huh.  
 18 Q. "Secondly, to assist the needy family  
 19 members of Confederate veterans"?  
 20 A. Uh-huh.  
 21 Q. Okay. "Third, to record the contributions  
 22 of women during the war and Reconstruction"?  
 23 A. Okay.  
 24 Q. And "Fourth, to preserve historic artifacts  
 25 and locations"?

8 (Pages 26 to 29)

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<p>1 A. Right.</p> <p>2 Q. All right. Moving back one page to</p> <p>3 Page 52, we have an August 28th e-mail?</p> <p>4 A. Uh-huh.</p> <p>5 Q. And that obviously was preremoval; correct?</p> <p>6 A. Uh-huh.</p> <p>7 Q. All right. And RT51 is dated August 7th,</p> <p>8 that is also preremoval?</p> <p>9 A. Uh-huh.</p> <p>10 Q. That's an e-mail from you to various --</p> <p>11 A. Council members, uh-huh.</p> <p>12 Q. Yeah.</p> <p>13 And RT50 appears to be the same thing as</p> <p>14 RT53.</p> <p>15 A. Yeah, it does.</p> <p>16 Q. To me. Does it appear so to you?</p> <p>17 A. Uh-huh, just the print looks smaller.</p> <p>18 Q. Yeah.</p> <p>19 And then the first page of the packet,</p> <p>20 RT49, to me -- well, it's different than -- yeah,</p> <p>21 that's a separate e-mail; correct?</p> <p>22 A. From September 5th to September 1st?</p> <p>23 Q. Yeah. RT49 is not duplicated anywhere else</p> <p>24 in Exhibit T-3, is it?</p> <p>25 A. I don't think so.</p>	<p>1 members maybe didn't understand the true meaning of</p> <p>2 the monument, and that they needed to know that. No</p> <p>3 one had ever asked us, and so I -- I sent this,</p> <p>4 hoping that receiving the correct information from</p> <p>5 the organization that placed the monument there would</p> <p>6 be helpful in making a fair decision about what it</p> <p>7 was they were trying to do.</p> <p>8 Q. This was educational?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. You don't indicate anywhere in this</p> <p>11 e-mail that you believed that your organization owned</p> <p>12 the monument, do you?</p> <p>13 A. Not in that. No.</p> <p>14 Q. Or that your organization owned the time</p> <p>15 capsule; correct?</p> <p>16 A. We -- I never mentioned the time capsule</p> <p>17 because I was concerned about its safety; so that, I</p> <p>18 didn't mention until they started taking it down.</p> <p>19 And I tried calling to inform them that the time</p> <p>20 capsule existed before something would happen to it.</p> <p>21 Q. So prior to removal there was never any</p> <p>22 assertion of ownership of the time capsule --</p> <p>23 A. No mention of the time capsule at all.</p> <p>24 Q. Okay. And in this Exhibit T-3, Page RT51,</p> <p>25 you don't indicate that your chapter owns any</p>
Page 35	Page 37
<p>1 Q. All right. So do you recall having sent</p> <p>2 any other e-mails to the City, besides the ones that</p> <p>3 I have here, except for the ones that were exchanged</p> <p>4 with the -- with the Clerk's office?</p> <p>5 A. Not that I recall.</p> <p>6 Q. Okay. So I want to take you to the first</p> <p>7 one that you sent. It was August 7th, and it's RT51.</p> <p>8 A. I'm sorry, RT --</p> <p>9 Q. RT51.</p> <p>10 A. Okay.</p> <p>11 Q. So there's handwriting at the top</p> <p>12 that says, "To all Council members"?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Whose handwriting is that?</p> <p>15 A. That looks like mine.</p> <p>16 Q. Okay. And then there's a "Yoakum National</p> <p>17 Bank"?</p> <p>18 A. I have no idea what that is there for.</p> <p>19 Q. Okay. Did you put that there?</p> <p>20 A. No.</p> <p>21 Q. Okay. It just ended up there?</p> <p>22 A. I don't even know what that is.</p> <p>23 Q. Okay. What was the purpose -- what was</p> <p>24 your purpose in sending this e-mail?</p> <p>25 A. You know, I think I felt like the Council</p>	<p>1 property in Travis Park either?</p> <p>2 A. Not in these e-mails. I had communication</p> <p>3 with Jackie Salvador; and my understanding was that</p> <p>4 this information was going to -- was going to the</p> <p>5 City. So I kind of saw it separate communication,</p> <p>6 that these e-mails were to try to educate on the</p> <p>7 meaning of the monument. And that the legal aspect</p> <p>8 of it was already being addressed through the</p> <p>9 information that I was sending to the Archives</p> <p>10 Department.</p> <p>11 Q. Okay. So there is nothing in the e-mail</p> <p>12 that you sent to the Council members indicating that</p> <p>13 your chapter was asserting an ownership interest in</p> <p>14 the park?</p> <p>15 A. No, I -- no.</p> <p>16 Q. Okay. And is it your belief that your</p> <p>17 e-mail -- the e-mails that you exchanged with</p> <p>18 Miss Salvador indicated an assertion by you that your</p> <p>19 chapter owned some type of a possessory interest --</p> <p>20 A. Yes.</p> <p>21 Q. -- in Travis Park?</p> <p>22 A. Yes.</p> <p>23 Q. And is it -- is it your testimony that the</p> <p>24 e-mails that you exchanged with Miss Salvador also</p> <p>25 expressed your contention that the chapter had an</p>

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1 ownership interest in the monument itself?  
 2 A. I'd have to look back at that. I don't  
 3 remember the ...  
 4 Q. Okay.  
 5 A. But I definitely made it clear that we had  
 6 an interest in it. I don't remember if there was --  
 7 ownership was ...  
 8 Q. Okay. The next page of T-3 is RT52. And  
 9 that was another prerule e-mail from you to the  
 10 City's decision-makers; is that correct?  
 11 A. Yes.  
 12 Q. Okay. Was the purpose of this e-mail  
 13 different than the purpose of your August 7th e-mail?  
 14 A. I would say it was different, yes.  
 15 Q. Okay. So what was the purpose of this one  
 16 that was different than the purpose of the August 7th  
 17 e-mail?  
 18 A. I just got -- I felt by this time that it  
 19 didn't seem to matter to them what the truth of the  
 20 monument was; and that what they were basing their  
 21 decision on had more to do with their own  
 22 interpretation of what they thought about the  
 23 monument and the people who put it there. And I felt  
 24 that they were basing it on racism, which did not  
 25 exist.

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1 Q. Okay. Do you think that there can be more  
 2 than one interpretation of what the monument means?  
 3 A. Depending on what you know about the  
 4 monument.  
 5 Q. Even with perfect knowledge, do you think  
 6 there can be differing interpretations?  
 7 A. For as many individuals as there are in  
 8 this world, that's how many opinions and views there  
 9 will be in this world.  
 10 Q. Okay. So apparently by the time that you  
 11 wrote this e-mail it appeared to you -- and I'm going  
 12 off of the first sentence of the text of the  
 13 e-mail -- that you believed that the City had decided  
 14 to move the statue from Travis Park anyway; is that  
 15 more or less true?  
 16 A. That's the way it was looking.  
 17 Q. Okay. And you advised -- if you look about  
 18 two-thirds of the way down the text, there's a  
 19 sentence that begins on the right with "You are  
 20 joining into a very dangerous practice"?  
 21 A. Uh-huh.  
 22 Q. So what is it that -- what is it that you  
 23 think the City was missing there?  
 24 A. I think they were trying to blame what  
 25 happened in Charlottesville, or use that incident as

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1 a reason to move this one.  
 2 And if that was the case, then what they  
 3 were saying was that we will give into violence. If  
 4 people want to be violent in order to get what they  
 5 want, that they would be willing to give into that.  
 6 And that's dangerous, because if you are  
 7 going to allow violence to rule rather than stand up  
 8 and say, "Let's bring the two sides together. Let's  
 9 have an understanding. Let's not jump into something  
 10 here," then really you're empowering those people who  
 11 are being violent.  
 12 Q. You go on to say that -- that "The war was  
 13 really one of independence"?  
 14 A. Yes.  
 15 Q. And what do you mean by that?  
 16 A. I mean that the war -- the war  
 17 started -- the war -- the war between the States or  
 18 the Civil War was not started over slavery.  
 19 President Lincoln and Jefferson Davis both stated  
 20 that the war was not about slavery. Lincoln wanted  
 21 to hold the Union together, and Davis wanted the  
 22 States' rights. There were issues that they were  
 23 fighting over. Did slavery exist? Yes. Did it  
 24 become a part of the war? Yes. But that's not why  
 25 the war was started.

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1 Q. Okay. So four lines, five lines up from  
 2 the bottom, you indicate that "The monument  
 3 represents a time that none of us wants to live"?  
 4 A. Uh-huh.  
 5 Q. I'm not sure what you meant by that. Could  
 6 you explain that?  
 7 A. Well, none of us wants to get into a civil  
 8 war. None of us wants to have to fight brother  
 9 against brother or father against son. And, of  
 10 course, none of us wants to see slavery. That's not  
 11 an acceptable thing.  
 12 Q. Okay. I -- that makes perfect sense. I  
 13 just don't think that I read that clearly when I read  
 14 it.  
 15 But you go on to say that "The monument  
 16 honors those who died for what they believed in"?  
 17 A. Yes.  
 18 Q. "And it was not slavery that they were  
 19 fighting for"?  
 20 A. Right.  
 21 Q. Okay. So it would matter, then, what the  
 22 reason was for -- you know, for the war itself, in  
 23 that respect?  
 24 A. I'm sorry. What --  
 25 Q. Okay. You were explaining earlier what you

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1 Q. Okay. Do you think there's anything wrong  
2 with -- with trying to distance yourself from things  
3 associated with slavery?  
4 A. No.  
5 Q. Okay. Was there any other -- well, let me  
6 ask you this.  
7 In the lead-up to the removal of the  
8 monument, did you hear any City personnel mention the  
9 Albert Sidney Johnston chapter?  
10 A. No.  
11 Q. Did you hear any City personnel mention the  
12 Bernard E. Bee chapter of the United Daughters of the  
13 Confederacy?  
14 A. Not that I recall.  
15 Q. Do you recall hearing any City official  
16 even reference the United Daughters of the  
17 Confederacy with respect to the removal?  
18 A. Not by name, the people who put it there.  
19 Q. Okay. And no one mentioned you personally?  
20 A. No, not that I know of.  
21 Q. When you spoke -- did you speak at City  
22 Council in the lead-up to the removal?  
23 A. Twice.  
24 Q. Okay. Did you identify yourself as a  
25 member of the chapter?

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1 A. I -- as the president of the chapter, yes.  
2 Q. Okay. Was there anything said to you with  
3 respect to your membership or office -- being an  
4 officeholder in the chapter?  
5 A. City Council's not allowed to speak to the  
6 speakers, so no one said much of anything to me.  
7 Q. Okay. You had other conversations with  
8 City personnel, as well, with respect to the monument  
9 removal, outside of these e-mails and outside of the  
10 e-mails that you sent to Miss Salvador, true?  
11 A. Yes.  
12 Q. All right. Who did you talk to?  
13 A. I talked to the policy advisor, Marisa  
14 Bono, I think is her name, briefly; just that I had  
15 concern, mainly, that I was trying to speak with  
16 Mayor Nirenberg.  
17 And she said to go to City Council hearing,  
18 that that was the -- really, the only opportunity I  
19 was going to have to speak with him.  
20 When it became clear that I wasn't going to  
21 be able to set an appointment with him, I went down  
22 to City Hall and I spoke with his secretary, Alice.  
23 And, actually, that was prior to talking to Marisa  
24 Bono, because Alice did say that she couldn't  
25 promise, but that it looked like the best she could

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1 do was that the policy advisor would call me, which  
2 she did call me and basically said, "Go to the City  
3 Council hearing."  
4 But when I spoke to Alice, I -- she gave me  
5 a form to fill out about wanting to meet with the  
6 mayor; and I was so nervous that I couldn't write.  
7 And so then she left and came back. And I told her  
8 that I really felt it was very important that I meet  
9 with the mayor over this Travis Park issue, because I  
10 knew they were getting ready to vote and I was afraid  
11 that we would not have the chance to talk; that I  
12 felt that there was a possible legal issue regarding  
13 the land at Travis Park, and it -- we needed to  
14 discuss this.  
15 And that's when she left and came back  
16 again and said that at the very least she thought  
17 that the policy advisor would call me, but that the  
18 mayor was not -- it was pretty clearly he wasn't  
19 going to meet with me.  
20 Q. So the conversation that you just  
21 described, was that with Alice or with Miss Bono?  
22 A. That was with Alice.  
23 Q. Okay. What's Alice's last name?  
24 A. I have no idea.  
25 Q. Fair enough.

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1 A. It's his secretary.  
2 Q. And you told her at that time that there  
3 was an issue with respect to a legal issue?  
4 A. Yes.  
5 Q. What legal issue was that?  
6 A. Regarding the land in Travis Park.  
7 Q. Okay. And she advised you to go talk to  
8 City Council?  
9 A. No, Alice said that -- well, she went to  
10 see if -- my understanding was she went to see if the  
11 mayor was going to meet with me, which he said "No"  
12 or who -- however she determined, it was "No," but  
13 that maybe the policy advisor would call me. So I  
14 don't know exactly what happened behind the closed  
15 doors there, but she just said that the mayor is not  
16 going to be able to meet with me, and that the policy  
17 advisor would probably be giving me a phone call.  
18 Q. And did you receive a call from the policy  
19 advisor?  
20 A. Right, yes, she did call. And she  
21 basically said, "Go to the City Council hearing."  
22 Q. And did you do that?  
23 A. Yes.  
24 Q. And did you bring up the legal issues that  
25 you wanted to discuss with the mayor?

13 (Pages 46 to 49)

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1 A. No.  
 2 Q. Why not?  
 3 A. Because I didn't feel that that was the  
 4 place to do that.  
 5 I believed that the information that I had  
 6 given to Salvador was going to City -- going to the  
 7 City Council. And I just didn't feel that that was  
 8 the forum to be having a legal discussion; not to  
 9 mention that the mayor was not going to answer me  
 10 back or ask me questions, what I really needed.  
 11 So I did say that they hadn't asked us  
 12 about anything or discussed anything with us, but I  
 13 don't -- I didn't go any further than that.  
 14 Then after the meeting is when I went up  
 15 and said, "Let's work together."  
 16 He said, "Yes, let's definitely work  
 17 together."  
 18 So I felt this was the beginning of a long  
 19 process and a long conversation. I had no idea, no  
 20 anticipation, that they would begin taking it down  
 21 the minute that they voted. I felt even if they  
 22 voted to take it down, he had promised me we would be  
 23 involved with it, so then at that point we could  
 24 start working together on "Let's talk about what's  
 25 going to happen from here on out." But there was no

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1 chance for that because they immediately started  
 2 taking it down.  
 3 When -- when I realized that they were  
 4 there taking it down -- and, of course, they didn't  
 5 know about the time capsule -- the offices were  
 6 closed. Miss Bono had called me from her cell phone  
 7 when she called, and so that was the only number I  
 8 had outside of the office.  
 9 So I called her cell-phone number and I  
 10 left two messages, I think one was that night and one  
 11 was the next morning, telling her, "There's a time  
 12 capsule. There's a time capsule." There -- this --  
 13 you know, "You need to know about this."  
 14 No response from anybody. So the next  
 15 morning I called over to City Council, to the City  
 16 Hall, and I talked to Alice again. And I said I was  
 17 calling to let -- talk about -- talk to the mayor,  
 18 and that there was this time capsule.  
 19 And she said, "Well, everybody's gone.  
 20 It's a holiday. They're all gone until -- through  
 21 Monday." So I took it Tuesday they were coming back.  
 22 She said, "I recommend that you send him an e-mail."  
 23 So that's why it's in this e-mail, because  
 24 I had no other way to try to tell him, "There's a  
 25 time capsule here." I tried calling the policy

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1 advisor, left her cell messages. Called City Hall,  
 2 he wasn't there. Wasn't getting -- Alice didn't say,  
 3 "Oh, let me call him," or "I'll have him call you";  
 4 it was just, "Send him an e-mail," so that's what I  
 5 did.  
 6 Q. So it seems that the time capsule and the  
 7 parkland possessory interest were very important to  
 8 you?  
 9 A. Yes.  
 10 Q. And the explanation that you've given for  
 11 not raising that prior to the Council vote was you  
 12 didn't feel that it was appropriate to talk about  
 13 those things --  
 14 A. Not in --  
 15 Q. -- before they voted?  
 16 A. Not in the City Council hearing.  
 17 Q. Can you explain why you didn't think that  
 18 that -- that it was an appropriate venue for  
 19 discussing the things that were important to you?  
 20 A. Well, because I felt like that wasn't a  
 21 place for opinion. I was there really more to try to  
 22 gain public support, because this was the public  
 23 citizens' hearings; so I wanted to give -- give the  
 24 truth of the monument there, for citizens to hear and  
 25 for City Council to hear; but I didn't feel it was a

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1 courtroom, where I needed to go in with the legal  
 2 aspects of it.  
 3 And again, I tried to contact through the  
 4 Archives Department and directly through the mayor's  
 5 office.  
 6 Q. But you had the opportunity to raise those  
 7 issues if you wanted to; correct?  
 8 MR. CRANE: Objection. Asked and answered.  
 9 MR. FITZPATRICK: I don't think I asked  
 10 that.  
 11 THE WITNESS: It didn't seem like the  
 12 appropriate place.  
 13 Q. BY MR. FITZPATRICK: Well, the question  
 14 was, you had the opportunity to raise those issues  
 15 before Council, but you chose not to; correct? And  
 16 by "those issues" I'm talking about the possessory  
 17 interest in the park and the time capsule.  
 18 A. Well, the time capsule I did not want to  
 19 bring up in public because I was afraid of someone  
 20 else trying to get their hands on it; so that didn't  
 21 feel like a public conversation, for sure, for the  
 22 protection of the time capsule.  
 23 And the legal issue seemed like that was  
 24 something that needed to be discussed in a  
 25 discussion, not as a public conversation

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1 A. I don't know. I mean, I -- I wouldn't say  
2 that that proves ownership. It proves that they were  
3 still ...  
4 Q. Well, let me ask you this. Could someone  
5 who didn't own the monument rededicate it?  
6 A. That would not make sense.  
7 Q. Okay. So continuing on Page 5 of  
8 Exhibit T-1, there's an allegation of a rejection of  
9 the committee's recommendation?  
10 A. I'm sorry, we're on Page 5, did you say?  
11 Q. I think we are. I'm not going to say we  
12 are. I'm sorry, we're on Page 6. Under Paragraph  
13 D -- 2(d), "Rejection of the committee's  
14 recommendation."  
15 A. "Policies" ...  
16 Q. Do you see where that's written?  
17 A. Uh-huh.  
18 Q. Do you know what committee that's referring  
19 to?  
20 A. No.  
21 Q. Do you know what kind of recommendation  
22 might have been made or rejected?  
23 A. I -- I -- no, I mean, that's not ...  
24 Q. And, Ms. Terrazas, that's fine. There may  
25 be things in there that -- I mean, you don't have to

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1 know everything that's in there. I'm just asking  
2 you -- I mean, if you know --  
3 A. I don't know.  
4 Q. Okay. And then on Page 6, under 2(a), it  
5 indicates that the monument was on private property  
6 or an easement.  
7 A. I'm not claiming that it's private  
8 property. We've -- we've claimed that we were given  
9 the use and the land on -- so it would be more like,  
10 I guess, easement would be.  
11 MR. CRANE: We'll stipulate that we're  
12 not -- plaintiff is not claiming the ownership  
13 rights -- fee ownership rights. I wrote this in  
14 November; and at the time, I wasn't sure what the  
15 ordinance said.  
16 MR. FITZPATRICK: Okay.  
17 MR. CRANE: But now we do know what it  
18 says; so, no, we're not claiming fee ownership.  
19 Q. BY MR. FITZPATRICK: So what are you  
20 claiming?  
21 A. That we have the right for the monument to  
22 be in the middle of Travis Park, by ordinance of the  
23 City.  
24 Q. Okay.  
25 A. Not that we own it, but that we were given

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1 an indefinite right for that statue to be there.  
2 Q. And that's the right that we talked about  
3 earlier that came from Exhibit T-2, which is --  
4 A. Yes.  
5 Q. -- the copy -- the certified copy; correct?  
6 A. Right, the ordinance.  
7 Q. Now, nowhere in there does it say  
8 "easement," does it?  
9 A. It does not use that term, no.  
10 Q. It doesn't use "right," either; correct?  
11 A. It grants the use of the amount of land  
12 petitioned for in the center of Travis Park.  
13 Q. Okay. And for the granting permission;  
14 correct?  
15 A. Right.  
16 Q. All right. And it was the permission that  
17 was asked for?  
18 A. Yes.  
19 Q. Okay. But my question was, the word  
20 "right" is never used in this document, is it, like  
21 granting a right?  
22 A. No.  
23 Q. Okay. All right. And neither is the word  
24 "license"?  
25 A. No.

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1 Q. We already talked about "perpetual,"  
2 there's no language in this that indicates that  
3 whatever was granted is not revocable; true?  
4 MR. CRANE: Objection, calls for legal  
5 conclusion.  
6 THE WITNESS: It doesn't say in any  
7 limitation on there.  
8 Q. BY MR. FITZPATRICK: Okay. Including any  
9 limitation on the right to revoke whatever was  
10 granted, would that be your understanding?  
11 A. It -- I clearly read from this that the  
12 land -- the use of the land was given to the  
13 Daughters of the Confederacy. And it doesn't say  
14 "until a certain point" or -- it just says that it  
15 can go.  
16 And knowing the size of the monument and  
17 the fact that the City engineer prepared everything  
18 for that, that it was intended to remain.  
19 Q. Okay. And I understand that we have  
20 differing interpretations of what this means. But  
21 what I'm asking you specifically is can you show me  
22 any language in this certified copy that's  
23 Exhibit T-2, that suggests that whatever was granted,  
24 whoever's interpretation is correct, is not  
25 revocable?

17 (Pages 62 to 65)

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1 A. There's nothing that says.  
 2 Q. Okay. Is there any language in that  
 3 exhibit that suggests that whatever right was granted  
 4 is transferable to anyone else?  
 5 A. Well, it says the United Daughters of the  
 6 Confederacy, which still exists; so the Daughters of  
 7 the Confederacy.  
 8 Q. The Daughters of the Confederacy aren't a  
 9 party to this lawsuit, are they?  
 10 A. Our chapter is, yes.  
 11 Q. Right. So in Exhibit No. T-1, you are  
 12 asking for damages; correct? I am looking at Pages 8  
 13 and 9.  
 14 So if you look under paragraph Roman  
 15 numeral VII, No. 1, you're asking for return of your  
 16 property; correct?  
 17 A. Uh-huh.  
 18 Q. And that property is the property we've  
 19 been talking about, the monument?  
 20 A. Right, the monument and the time capsule  
 21 that was inside of it.  
 22 Q. And the time capsule. All right.  
 23 What about -- what about the property in  
 24 Travis Park?  
 25 A. Well, what we're asking for is that the

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1 A. Right.  
 2 Q. And that we owe you the market value, so --  
 3 A. Well, what we really want is the monument  
 4 put back in Travis Park; so we don't need -- if this  
 5 is all -- it would be after the fact of, "Okay, now  
 6 we're not going to honor this," then it becomes ...  
 7 Q. Well, let me ask it this way.  
 8 Assuming that the City were ordered to give  
 9 you the monument back and put it back in Travis  
 10 Park --  
 11 A. Uh-huh.  
 12 Q. -- what damage are you looking for -- what  
 13 monetary damage are you looking for at that point?  
 14 A. At that point we would want any damage that  
 15 was done to the monument, or the cost of putting it  
 16 back up, all to be paid for by the City.  
 17 Q. Okay.  
 18 A. So any restoration and replacement of  
 19 putting it back in the Park, to all be paid for by  
 20 the City.  
 21 Q. Now, we heard Mr. Schlitzberger's  
 22 testimony, where he estimated the replacement value  
 23 of the statue; correct?  
 24 A. That was to recreate it; but that wouldn't  
 25 be the value of that particular monument, of the

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1 property goes back to Travis Park.  
 2 Q. Okay. So are you asking for whatever your  
 3 interest is in Travis Park be restored to you?  
 4 A. The use of the land for the statue, yes.  
 5 Q. All right. Now, getting back to  
 6 Exhibit T-2, do you see anything in that document  
 7 that says "the use of the land for the statue"?  
 8 A. Well, it says, "for permission to erect a  
 9 monument in the Travis Park." And then it says,  
 10 "Hereby granted -- permission be hereby granted to  
 11 the Daughters to use the amount of land petitioned  
 12 for in the center of Travis Park."  
 13 What was your question again?  
 14 Q. Let me just move on to a new one.  
 15 What are the compensatory damages you're  
 16 looking for?  
 17 A. I don't know that that can -- well, any --  
 18 any damage that was done to the monument as a result  
 19 of the move, to be repaired.  
 20 Q. That's assuming you get the monument back;  
 21 right?  
 22 A. Yeah, I don't know how to answer that.  
 23 Q. Well, I mean, you're making a taking claim,  
 24 which means that we took your property and it's ours  
 25 now.

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1 artist, you know, Teach.  
 2 Q. Okay. But he didn't give a -- he didn't  
 3 give an opinion as to how much it would cost to  
 4 repair any damage to the statue; right?  
 5 A. No, I don't think so.  
 6 Q. Okay. Do you have that figure?  
 7 A. I don't.  
 8 Q. All right. Now, let's say that the City of  
 9 San Antonio were to not give you back the statue, but  
 10 keep it, what is the amount of damages that you're  
 11 looking for in that instance?  
 12 A. I can't say that's been my thought, because  
 13 my thought is that this is about the monument going  
 14 back to Travis Park.  
 15 Q. You indicated in your interrogatory  
 16 response that you want to recover for untrue things  
 17 that were said about your members. Do you recall  
 18 giving that answer?  
 19 A. No, but I'll take it.  
 20 Q. Are you in fact looking to recover for  
 21 that?  
 22 A. I think what I would like to see is for the  
 23 City simply to help repair that.  
 24 Q. What amount of damage -- monetary damage --  
 25 do you think is appropriate for the untrue things

18 (Pages 66 to 69)

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1 aware of that supports Miss Oldham's statement  
2 concerning City Council giving permission and a  
3 perpetual place in Travis Park to erect the monument?

4 A. You know, if we could find the minutes from  
5 that time period; and if we could find the petition  
6 that was written by the Daughters to the City, I  
7 would think that that would answer these -- some of  
8 these questions. But that I've seen, no.

9 Q. Okay. And I think that I'm about to rap  
10 up. Can I have like 30 seconds to look over some  
11 materials? And I have maybe two questions for you  
12 that I know of right now.

13 A. Okay.

14 MR. CRANE: Yeah. And I'd like to ask a  
15 couple follow-up questions, if you have time.

16 THE WITNESS: Okay.

17 (A brief recess was taken.)

18 Q. BY MR. FITZPATRICK: Is it your contention  
19 that the City broke the tip of the rifle off during  
20 the removal of the statue from Travis Park?

21 A. The tip of it? I don't know. I'd have  
22 to -- I'm -- any damage that was done, I would say  
23 we'd have to just compare photographs to the statue  
24 prior to its take-down; and then any damage that now  
25 exists.

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1 Q. Okay. I will reserve any remaining  
2 questions till the time of trial.

3 A. Okay.

4  
5 EXAMINATION  
6 BY MR. CRANE:

7 Q. Robin, I just have a couple of questions.  
8 If you could pull out the Exhibit T-1,  
9 that's the complaint.

10 A. (Witness complies.) I see T-2 on here.

11 Q. This is T-1, right here.

12 A. I'm just getting everything organized.

13 Q. Well, it's good to keep it together,  
14 because the court reporter will definitely need  
15 those.

16 A. Yeah. Okay, so T-1.

17 Q. If you look and turn to Page 4, and look at  
18 Paragraph 12.

19 A. Okay.

20 Q. Mr. Fitzpatrick asked you questions about  
21 the City Council and I think his phrase was, "Did  
22 anyone at the City ever use the term 'racist'?" I  
23 understood your answer eventually to be no, not that  
24 you recall.

25 But do you recall statements that caused

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1 you to believe -- let me rephrase that.

2 Did you believe, back in August of 2017,  
3 that persons who are employed by the City were using  
4 inaccurate terminology to talk about the Confederate  
5 statue?

6 A. Yes, I feel the way that they talked about  
7 the statue, the way they presented, implied racism  
8 and implied blame on anyone who supported the  
9 monument.

10 Q. Do you remember what phrases somebody at  
11 the City used? You mentioned one. One was "those  
12 people who put it up"; is that right?

13 A. Right. Trevino's comment, "The people who  
14 put it there," and just the way that he said it.

15 Q. Do you remember --

16 A. And then --

17 Q. Sure. Do you remember anything else by him  
18 or of the mayor?

19 A. No, I think a lot of it that the mayor said  
20 was in writing on his thing. And, too, just the way  
21 that I feel that they -- they allowed people to talk  
22 against the monument and those in support of.

23 Q. Does -- in your view, does the Confederate  
24 memorial represent the Confederate States of America?

25 A. No, it supports those that died defending

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1 their homes and families.

2 Q. When the mayor was making his remarks about  
3 "a lost cause" was he talking about the Confederate  
4 memorial in Travis Park?

5 A. He was -- it seem -- yes, he was referring  
6 to the monument.

7 Q. When you appeared at the Citizens to be  
8 Heard meetings, did I understand you correctly, did  
9 you do that twice?

10 A. Yes.

11 Q. Can you describe briefly how that works,  
12 Citizens to be Heard?

13 A. You -- so you go and you have -- you have  
14 to sign up before you go. And then you're given  
15 three minutes to speak, or they reserve the right to  
16 give you less time if they feel that there are too  
17 many people, or so many people speaking, then they  
18 need to decrease that time.

19 So the first time I spoke, I did have three  
20 minutes. The second time I spoke, I had two minutes.

21 Q. And when you -- after you speak, does the  
22 mayor or the members of the City Council, do they ask  
23 you questions about what you just said?

24 A. They're -- no, they don't. In fact, I  
25 believe it was Mayor Nirenberg explained to someone

25 (Pages 94 to 97)

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1 who tried to ask him a question that they were not  
 2 there to -- to say anything, make comments, answer  
 3 questions; they were just there to listen.  
 4 Q. Did you feel like that was a good place to  
 5 talk about a complicated legal issue?  
 6 A. No.  
 7 Q. And why not, ma'am?  
 8 A. Because you can't have a dialogue, you  
 9 can't -- I couldn't ask him a question or have any  
 10 meaningful conversation. I mean, I couldn't have any  
 11 conversation at all with him regarding anything.  
 12 Q. I want to ask you a different topic. The  
 13 Barnard Bee chapter transferred items or interests to  
 14 the Albert Sidney Johnston chapter.  
 15 To your knowledge is -- well, let me back  
 16 up. You're president of the Albert Sidney Johnston  
 17 chapter. Is the next higher level for you the Texas  
 18 Division of the Daughters of the Confederacy?  
 19 A. Yes.  
 20 Q. So your higher-up would be whoever is in  
 21 charge of the Texas Division?  
 22 A. Yes.  
 23 Q. When the items or property was transferred  
 24 from the Bee chapter or to the Johnston chapter, to  
 25 your knowledge was Texas Division satisfied with how

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1 that transfer occurred?  
 2 A. The --  
 3 MR. FITZPATRICK: Objection.  
 4 Q. BY MR. CRANE: You can -- well, go ahead  
 5 and answer.  
 6 Were they satisfied with that transfer, as  
 7 far as you know?  
 8 A. As far as I know.  
 9 Q. Did the Texas Division ever say to you  
 10 something wasn't right about that?  
 11 A. No.  
 12 Q. Did -- has the Texas Division ever said to  
 13 you, "Hey, wait, you don't own it. Texas Division  
 14 owns the statue that used to be in Travis Park"?  
 15 A. No. No, they consider us the owners.  
 16 Q. Has Texas Division ever sent you a letter  
 17 or an e-mail or a telegram saying, "You guys can't  
 18 own those lots in the cemetery, we have to own them"?  
 19 A. No.  
 20 Q. I have no other questions until trial.  
 21 Thank you.  
 22  
 23 FURTHER EXAMINATION  
 24 BY MR. FITZPATRICK:  
 25 Q. Actually, I have some follow-ups.

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1 You just testified in response to your  
 2 counsel's questions, that you believe that the City  
 3 representatives used inaccurate terminology  
 4 discussing the monument. Do you recall saying that?  
 5 A. I feel they implied -- their implications  
 6 were ...  
 7 Q. Okay. You believe that there were  
 8 implications of racism; right?  
 9 A. Yes.  
 10 Q. That's what you said. There was never a  
 11 mention of racism, though; correct?  
 12 A. It seems that there was.  
 13 Q. By -- by City representatives?  
 14 A. I recall thinking so.  
 15 Q. Okay. Do you recall -- I mean, we went  
 16 over this earlier in your deposition, and you didn't  
 17 recall any then.  
 18 Are you -- do you think that you might  
 19 recall some now?  
 20 A. I don't. I just remember feeling over and  
 21 over that they were pointing to the monument as being  
 22 racist, and supporting the idea that anyone who  
 23 supported the monument would be racist.  
 24 Q. And I think that that term that you used,  
 25 "feeling," is important here. Do you know the

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1 difference between an inference and an implication?  
 2 A. Explain.  
 3 Q. Well, so an implication is something that  
 4 is intended to carry a certain meaning. And an  
 5 inference is something that is gleaned by the  
 6 receiver as carrying a certain meaning.  
 7 And it sounds to me when you're describing  
 8 your feeling, you were describing how you received  
 9 the information rather than how --  
 10 A. No, I feel that they purposely were trying  
 11 to present it that way.  
 12 Q. Okay. Tell me exactly what they said that  
 13 presented it that way, and tell me what "that way"  
 14 means.  
 15 Well, let's start with, tell me exactly  
 16 what "that way" means.  
 17 A. I think that they were purposely trying to  
 18 paint the monument or memorial as racist. And I  
 19 think they were purposely trying to paint the  
 20 supporters of it remaining as being racist.  
 21 Q. Okay. And what did they say to try to  
 22 paint that picture?  
 23 A. Well, if you go back to what  
 24 Mayor Nirenberg put on his website, the things he  
 25 said there; and then Trevino saying "the people who

## Exhibit T3

From: Robin Terrazas <robintmusic@aol.com>  
To: ron.nirenberg <ron.nirenberg@sanantonio.gov>  
Bcc: mccammon <mccammon@beecreek.net>  
Subject: UDC involvement and property  
Date: Fri, Sep 1, 2017 9:15 am

---

Mayor Nirenberg,

Wednesday night you looked me in the eye, shook my hand and assured me that you would work with us regarding the monument. I have not heard from you since, yet you have already moved the monument (or are in the process of) and not communicated a thing. There are items in the base of the monument that I believe should be returned to the UDC immediately for safe keeping. These are things that could easily be transported and not require a large space for storage. I had hoped and believed that, even with a vote to move the monument, we could have worked on a plan regarding the removal and new placement. Removing it in the middle of the night without a plan is irresponsible and shows absolutely no respect for our organization. As I have stressed to you before, we are not racist, we do not support white supremacy, we want to work with the city and yes, preservation of our true history, is a top priority. You have yet to show me that you have any intention of being "all inclusive" when you have acted in this manner. I am deeply disappointed by your actions and hope that you will be in touch soon so that we can move forward together.

Sincerely,  
Robin Terrazas  
Chapter President, ASJ 2060, UDC



RT000049

From: Robin Terrazas <robintmusic@aol.com>  
To: ron.Nirenberg <ron.Nirenberg@sanantonio.gov>; bruce.davidson <bruce.davidson@sanantonio.gov>;  
Maria.cesar <Maria.cesar@sanantonio.gov>; citymanager <citymanager@sanantonio.gov>  
Subject: UDC Monument belongs to our chapter, not the city  
Date: Tue, Sep 5, 2017 1:02 pm

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Mayor Nirenberg,

The one and only time you have acknowledged my attempts to reach you was the night prior to your vote regarding the UDC monument in Travis Park. You shook my hand and assured me you would include us in the relocation of the monument. The next day you voted to move it and immediately began the process without any communication with me. Though you may have had the right to no longer house the monument at Travis Park (which is still questionable considering no proof of deed was ever produced), you did not have the right to move it without coordination with the UDC chapter in San Antonio who was named successor of the Barnard Bee chapter that placed the monument. Our organization was given permission by the city in 1899 to place the monument which it paid for (both the monument and all costs associated with placement). At no time was the monument given to the city. Furthermore, as I have communicated to your policy advisor by voicemail the night of removal and the following morning, there is a time capsule that rightfully belongs to us that should not be disturbed without our planning and involvement. I have also communicated this to you via email on Friday as crews continued working on the removal. No one has answered my concerns. I do not believe the city has the right to decide what happens to the monument and must be held responsible for it remaining in good condition. I feel it is important that our organization is allowed to see the monument to assess its condition. Any further movement of the monument should be coordinated with the Albert Sidney Johnston 2060 chapter of the UDC and paid for by the city who prematurely moved it. I have most recently tried calling your office this morning with no response from you.

Robin Terrazas  
Chapter President, Albert Sidney Johnston 2060, UDC  
210-273-7418

RT000050

Sent to all  
Council members

From: noreply <noreply@sanantonio.gov>  
To: Alice Aguirre <Alice.Aguirre@sanantonio.gov>  
Cc: roblntmusic <roblntmusic@aol.com>  
Subject: Online Feedback Submission: Travis Park  
Date: Mon, Aug 7, 2017 6:20 pm

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## Contact Us

Name: Robin Terrazas  
Phone Number:  
Email: [roblntmusic@aol.com](mailto:roblntmusic@aol.com)  
Contact Pref: Email  
Subject: Travis Park

**Yoakum National Bank**  
[www.yoakumnationalbank.com](http://www.yoakumnationalbank.com)

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**Comments or Question:** Facts you should know about Travis Park and its Monument. Travis Park was donated to the city in the 1870s by former mayor Samuel Augustus Maverick. His wife Mary was one of the women who worked to have the monument placed. The property, now Travis Park, once served as a Confederate Hospital. The monument was paid for by many small, nickel and dime, local contributions of an impoverished population. Most interesting about the contributions is that they were received from citizens who had worn the "blue" and those that worn the "grey". The monument was designed by a woman, Miss Virginia Montgomery. Historically, it was the first monument in this country ever designed by a woman. It was the first monument ever placed here in San Antonio. The purpose of the monument is to honor all Confederate veterans who died during the war... not only white, but Hispanic, Black, and Native American. The front of the monument reads "Confederate Dead." On the rear it reads "Lest We Forget." This phrase, "Lest We Forget" comes from a poem written in 1897 by Rudyard Kipling entitled "Recessional." The poem points to a tumultuous past and the importance of remembering God. The tumult and the shouting dies The Captains and the Kings depart Still stands Thine ancient sacrifice An humble and a contrite heart Lord God of Hosts, be with us yet Lest we forget – lest we forget When this monument was placed in 1899, the south was in the midst of a long recovery from a tumultuous past. Many friends and family had died fighting for their communities, and the rest were left with the tremendous job of rebuilding. Yes, the Confederacy lost, but the south remains dedicated to this great country. We are not an uncivilized society like other places in the world where they destroy ancient statues and cities – places the world has condemned. History should not be erased by the taking down of Veteran Monuments, especially when they are part of our very own American history. This ever important memorial of those who fought, died, and suffered as a result of war should serve as a reminder that war is devastating. Even more so when it is fought in your home. Our country has come a long way since this monument was placed. And progress will continue to be made. Let's keep our history alive and move forward with mutual respect. Let this monument continue to honor those who were willing to stand up for what they believed in, and at the same time, serve as a benchmark and educator of history. May your legacy be treated the same as you treat the legacy of those who came before you.

From: noreply <noreply@sanantonio.gov>  
To: district2 <district2@sanantonio.gov>  
Cc: robintmusic <robintmusic@aol.com>  
Subject: Online Feedback Submission: Travis Park Monument  
Date: Mon, Aug 28, 2017 2:50 pm

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## Contact Us

**Name:** Robin Terrazas

**Phone Number:**

**Email:** [robintmusic@aol.com](mailto:robintmusic@aol.com)

**Contact Pref:** Email

**Subject:** Travis Park Monument

**Comments or Question:** It seems you have decided to move the statue from Travis Park without any further consideration from the public. I hope I am wrong, but should you be planning to do so, remember that though this may not be your heritage, you do HAVE one, and it is not without blemish. If you are to hold the standard of only monuments for perfect people, then no monument can stand except for one of Jesus Christ. However, because you are supposedly worried about offending people, then that cannot stand either because there are non Christians living in this country. You are joining in to a very dangerous practice of censorship in this country and actively supporting false history. Though slavery was an issue during the war, it was really of war of independence just like the Revolutionary War and Texas wars. Though some extreme racists have tried to use confederate icons for their own, they are criminals who do not represent true historians. You are giving in to 2 sides of violence and leaving out the true moderate Americans who support and understand the truth. You are a coward if you cannot and will not stand up for the truth, and the truth is that the monument is not racist, it represents a time none of us wants to live and it honors those who died for what they believed in.....and it was not slavery they were fighting for. Even Robert E Lee did NOT own slaves. Either way you are making history. Please stand for the truth, not violent offenders who try to bully their way through this country.